

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,))
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al,)

Defendants.)

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VOLUME I OF THE VIDEOTAPED
30(b)(6) DEPOSITION OF TIM ALSUP, produced as a
witness on behalf of the Plaintiff in the above
styled and numbered cause, taken on the 24th day of
June, 2008, in the City of Tulsa, County of Tulsa,
State of Oklahoma, before me, Lisa A. Steinmeyer, a
Certified Shorthand Reporter, duly certified under
and by virtue of the laws of the State of Oklahoma.

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918-587-2878

EXHIBIT

12

1 those two that you identified that were --I believe
2 those were involved with Cargill, Inc.; correct?

3 A Uh-huh.

4 Q So those wouldn't be applicable for the LLC

5 questions. Has the LLC disciplined any of its 11:03AM

6 growers for failing to adhere to any environmental
7 laws, rules or regulations?

8 A No, sir.

9 Q Prior to July 1, 1998, did Cargill know what

10 its growers, contract growers did with the poultry 11:04AM

11 waste that was produced by the birds in the barn?

12 A Specifically, no.

13 Q Generally did they know what was done with the

14 poultry waste that was removed prior to 1998?

15 MR. WALKER: Object to the form. 11:04AM

16 A Generally Cargill understood that the turkey

17 litter was being utilized either by them or others

18 as a fertilizer.

19 Q In fact, we saw a document earlier here today

20 that said they should clean out and spread it, and 11:05AM

21 we talked about that being spread on the land;

22 correct?

23 A Yes, sir.

24 Q Okay. Would you agree with me that since 1998

25 Cargill's knowledge, that general knowledge about 11:05AM

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